

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL,  
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**NOTICE OF MOTION TO DISMISS THE INDICTMENT  
OR IN THE ALTERNATIVE FOR A BILL OF PARTICULARS**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated November 16, 2018, the Declaration of Kathleen E. Cassidy, dated November 16, 2018, and the exhibit appended thereto, Defendants Clare Bronfman, Kathy Russell, and Nancy Salzman move this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the Superseding Indictment or, in the alternative, directing the government to provide a bill of particulars, and for such other and further relief as the Court may deem proper.

Dated: November 16, 2018  
New York, New York

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